

Michael J. Curls (SBN 159651)
Nichelle D. Jones (SBN 186308)
LAW OFFICE OF MICHAEL J. CURLS
4340 Leimert Boulevard, Suite 200
Los Angeles, California 90008
Tel: 323-293-2314
Fax: 323-293-2350
E-mail: michael@mjclawoffice.com
nichelle@mjclawoffice.com

Attorneys for Plaintiff

Jody Struck, SBN 121097
HAAPALA, THOMPSON & ABERN, LLP
1939 Harrison Street, Suite 800
Oakland, California 94612
Tel: 510-763-2324
Fax: 510-273-8534
E-mail: rwiden@htalaw.com

Attorneys for Defendants
COUNTY OF SANTA CRUZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

MARLENE HENDERSON, THE ESTATE OF
EDYTH HENDERSON, and THE ESTATE
OF JOSEPH HENDERSON,

Plaintiffs,

vs.

COUNTY OF SANTA CRUZ, THE SANTA
CRUZ COUNTY SHERIFF'S
DEPARTMENT, THE SANTA CRUZ
COUNTY HEALTH SERVICES AGENCY,
and DOES 1 THROUGH 25, INCLUSIVE,

Defendants

Case No.: 3:14-cv-03544 WHO
(HRL)

**STIPULATION AND ORDER TO
CONTINUE DEADLINE TO
OPPOSE DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT AND TO AUGMENT
THE BRIEFING SCHEDULE**

1
2 TO THE HONORABLE COURT:

3 This stipulation is entered into by and between the plaintiffs and the defendants,
4 by and through their respective counsel.

5 1. On February 19, 2020, Defendant filed a Motion for Summary Judgment.
6 [Doc.101] Plaintiff's response is due on or before March 4, 2020.
7

8 2. On March 20, 2020, the scheduling order was augmented [Doc.107] and
9 the hearing was continued to July 17, 2020; Plaintiffs' Opposition is due on June 26,
10 2020 and Defendant's Reply is due on July 3, 2020.

11 3. Since the COVID-19 quarantine, counsel for Plaintiff has experienced
12 deaths of family and friends. As such, counsel have met and conferred and stipulated
13 to a short continuance to allows Plaintiff's counsel to deal with personal issues and
14 additional time to file Plaintiff's opposition.
15

16 4. The parties continue to engage in meaningful settlement dialogue.

17 5. Based on the foregoing, the parties seek to to extend the time for Plaintiff to
18 respond to Defendants' Motion for Summary Judgment from June 26, 2020 to July 10,
19 2020; and the time for Defendant to file their Reply Brief from July 3, 2020 to July 17,
20 2020.
21

22 ///

23 ///

24 ///

1 6. The parties further seek to amend the current scheduling order to continue
2 the deadline to hear Motions for Summary Judgment from July 17, 2020 to July 31,
3 2020 and to continue the hearing on Defendants' Motion for Summary Judgment
4 accordingly.

5 NOW THEREFORE, IT IS HEREBY STIPULATED by the Parties, subject to
6 approval by this Court, that the Scheduling Order be amended as follows:
7

8
9 Dated: June 25, 2020 LAW OFFICES OF MICHAEL J. CURLS

10
11 By: */s/ Nichelle D. Jones
12 Nichelle D. Jones
13 Attorney For Plaintiff

14 Dated: June 25, 2020 HAAPALA, THOMPSON & ABERN, LLP

15
16 By: /s/ Jody Struck
17 Jody Struck
18 Attorneys for Defendant
19 *Ms. Struck provided her consent that this
20 document be electronically filed
21
22
23
24
25
26
27
28
29
30
31
32

MODIFIED ORDER

PER STIPULATION OF COUNSEL, as modified below, IT IS HEREBY
ORDERED that the motion deadlines be revised as follows:

Deadline for Plaintiff to Respond

to Defendants' Motion for Summary

Judgment:

July 10, 2020

Deadline for Defendants to Reply to

Plaintiff's Opposition to Motion for Summary

Judgment:

July 17, 2020

Hearing on Defendants' Motion for

Summary Judgment:

August 19, 2020

DATED: June 25, 2020

A handwritten signature in black ink, appearing to read "W. A. Ode", is written over a horizontal line.

Judge of the United States District Court